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No Filing Fee Required  
Govt. Code § 6103

Attorneys for Defendant K. Torres

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**HAROLD TAYLOR, et al.,**

**Plaintiff,**

**v.**

**WARDEN BORDER, et al.,**

**Defendant.**

) **Case No. 5:18-CV-02488-AB-AGR**

)  
) **DEFENDANT K. TORRES' NOTICE OF**  
) **JOINDER AND JOINDER TO**  
) **DEFENDANTS CALIFORNIA**  
) **DEPARTMENT OF CORRECTIONS**  
) **AND REHABILITATION, S.**  
) **ALMOSARA, D. BORDER, B.**  
) **BARELLA, J. CAVENDER, J. CORE, T.**  
) **LAMBERT, I. MORALES, AND T. LE'S**  
) **MOTION TO DISMISS PLAINTIFFS'**  
) **COMPLAINT [F.R.C.P. Rule**  
) **12(b)(6)](ECF. NO.42)**

)  
) District Judge: Hon. André Birotte Jr.  
) Magistrate Judge: Hon. Alicia G. Rosenberg  
) Action filed: 11/27/2018

TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF  
RECORD:

PLEASE TAKE NOTICE that Defendant K. TORRES ("DEFENDANT")  
hereby Joins in the arguments set forth in the Motion to Dismiss Plaintiffs'  
Complaint filed on December 9, 2019 by Defendants California Department of  
Corrections and Rehabilitation ("CDCR"), S. Almosara, D. Border, B. Barella, J.  
Cavender, J. Core, T. Lambert, I. Morales, and T. Le. (ECF. No. 42). The arguments  
set forth in Defendants' Motion to Dismiss pursuant to Federal Rule 12(b)(6) (ECF.

1 No. 42) apply with equal force to Defendant K. Torres. Therefore, Defendant Torres  
2 joins in the arguments in their entirety, as they apply in equal force to him, including  
3 all arguments and statements of issue or fact contained therein.  
4

5 DATED: December 10, 2019

Respectfully submitted,

6 NIELD LAW GROUP APC  
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8 By: /s/ Gabrielle DeSantis Nield  
9 Edgar R. Nield,  
10 Gabrielle DeSantis Nield,  
11 Attorneys for Defendant K. Torres  
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